

A. As far as I can tell from what was in truth an exhaustive search of the land records, the northern half of Lot 13 was never conveyed as such.

Q. On the record atleast?

A. It can only be conveyed, in my opinion, by the deed actually going to record and it has never gotten to record. A deed calling for the northern half of Lot 13, 20' width and 135' depth has never been recorded out of Marshall Schaeffer.

Q. Going back in time after those four conveyances, who still owned the fee simple title to the northern half of Lot 13? In your opinion.

A. In my opinion, Marshall Schaeffer died with the technical legal title to the northern half of Lot 13 and the property would have passed to his heirs at law.

Q. I would like to show you what has been marked as Exhibit 6 and ask if you can identify it?

A. Exhibit 6 is Liber 326, Folio 155, it is a true copy, as have been all the exhibits handed to me, of a deed recorded among the Land Records and the Charles W. Steward and Laura his wife who received title to what was purported to be the northern half of Lot 14 Block 6 is now passing title by this deed for that same description calling for a 20' width and a 135' depth to Grover L. Michael.

Q. What is the effect of the erroneous description?

A. Whatever interest the Stewards obtained in the deed from Marshall Schaeffer is now intended to be passed to Grover L. Michael. As I mentioned before, the predecessor to this deed, the deed from Schaeffer to Steward is very confusing as it will not meet with the plats, but this purports to pass that on down to Grover L. Michael.

Q. I would like to show you Exhibit 7 and ask if you can identify it?

A. Exhibit 7 is a true copy of the deed recorded in Liber 428, Folio 481 and by this deed Grover L. Michael and Catherine R. Michael, his wife convey unto Paul S. Michael and Blanche A., his wife the same description which Mr. Michael received in Exhibit 6 from the Stewards. Whatever passed to him in the Stewards to Michael deed is now being passed in the Grover L. Michael to Paul S. Michael deed.